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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

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24 THOMAS CLARENCE COUSEY, et al.,) Case No.: C05-01117 TEH
Plaintiff,)
vs.)
CITY OF OAKLAND, et al.,)
Defendants.)
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) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING TIME TO**
) **COMPLETE EXPERT DISCLOSURES**
) **AND EXPERT DISCOVERY**

1 WHEREAS, plaintiffs had intended to disclose Frank Saunders as their police practices
2 expert pursuant to F.R.C.P. 26; whereas plaintiffs' counsel has learned that Mr. Saunders is now
3 deceased; and whereas plaintiffs need additional time to retain police practices expert(s) for trial,

4 IT IS HEREBY STIPULATED AND AGREED THAT the deadline for disclosure of the
5 identities of expert witnesses should be extended for both plaintiffs and defendants as set forth
6 below. Other than with respect to the disclosure of the identities of the experts, the parties
7 anticipate at this time that they will be able to comply with the other deadlines set forth in the
8 Court's Order for Pretrial Preparation.

9 Plaintiffs' Deadline to Disclose Identity of Experts: January 5, 2007

10 Defendants' Deadline to Disclosure Identity of Experts: January 19, 2007

11 Both Parties' Deadline to Comply with Rule 26 Expert Disclosures: February 2, 2007

12 Both Parties' Deadline to Complete Expert Depositions: February 6, 2007

13 IT IS SO STIPULATED:

14 Dated: November 7, 2006


15 JAMES B. CHANIN
Attorney for Plaintiffs

16 Dated: November 7, 2006


17 STEPHEN Q. ROWELL
Attorney for Defendants

18 PURSUANT TO STIPULATION,
19 IT IS SO ORDERED:

20 Dated: November 13, 2006

